

FILED

August 24, 2022

UNITED STATES DISTRICT COURT
 WESTERN DISTRICT OF TEXAS
 DEL RIO DIVISION

CLERK, U.S. DISTRICT COURT
 WESTERN DISTRICT OF TEXAS
 By: CR
 Deputy

DR:22-CR-01883-AM

UNITED STATES OF AMERICA	§	CAUSE NO.:
	§	
	§	
v.	§	<u>INDICTMENT</u>
	§	
	§	[VIO: COUNT ONE: 8 U.S.C. §
CIERRA OLMOS (1),	§	1324(a)(1)(A)(v)(I) & (B)(i) Conspiracy
JESUS IVAN VALADEZ (2).	§	to Transport Illegal Aliens.]
	§	
	§	FORFEITURE

THE GRAND JURY CHARGES:

COUNT ONE

[8 U.S.C. § 1324(a)(1)(A)(v)(I) & (B)(i)]

On or about July 25, 2022, in the Western District of Texas, Defendants,

CIERRA OLMOS,
 JESUS IVAN VALADEZ,

did knowingly and intentionally combine, conspire, confederate and agree with others known and unknown, to commit the following offense against the United States: to transport and move, and attempt to transport and move, by means of transportation or otherwise, aliens who entered and remained in the United States in violation of law, knowing and in reckless disregard of the fact said aliens came to, entered, and remained in the United States in violation of law, and in furtherance of such violation of law, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(v)(I) and (B)(i).

NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE

[See FED. R. CRIM. P. 32.2]

I.

Immigration Violations and Forfeiture Statute

**[Title 8 U.S.C. § 1324(a)(1)(A)(v)(I) & (B)(i),
subject to forfeiture pursuant to Title 18 U.S.C. § 982(a)(6)(A)]**

As a result of the foregoing criminal violations set forth in Count One, the United States of America gives notice to the Defendants of its intent to seek the forfeiture of property, including any items listed below, upon conviction and as a part of sentence pursuant to FED. R. CRIM. P. 32.2 and Title 18 U.S.C. § 982(a)(6)(A) which states the following:

Title 18 U.S.C. § 982 Criminal forfeiture

(a)(6)(A) The court, in imposing sentence on a person convicted of a violation of, or conspiracy to violate, section 274(a) . . . of the Immigration and Nationality Act . . . shall order that the person forfeit to the United States, regardless of any provision of State law—

- (i)** any conveyance, including any vessel, vehicle, or aircraft used in the commission of the offense of which the person is convicted; and
- (ii)** any property real or personal—
 - (I)** that constitutes, or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offense of which the person is convicted; or
 - (II)** that is used to facilitate, or is intended to be used to facilitate, the commission of the offense of which the person is convicted.

This Notice of Demand for Forfeiture includes but is not limited to the following properties.

- 1. Ruger LC9, 9mm pistol, s/n 321-05864;**
- 2. 9mm magazine;**
- 3. 7 rounds 9mm ammunition; and**
- 4. Any other related ammunition and firearm accessories.**

A TRUE BILL



FOREPERSON

ASHLEY C. HOFF
United States Attorney

By:

A handwritten signature in blue ink, appearing to read "Zachary D. Bird".

ZACHARY D. BIRD / ALEXANDER BROWN
Assistant United States Attorney